

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA
Plaintiff,

v.

ANTHONY VÁZQUEZ ARROYO (13)
Defendant.

Criminal no. 19-121 (SCC)

Motion requesting extension of time to file change of plea motion

To the Honorable Court:

Comes now the defendant, Mr. Vázquez Arroyo, and respectfully states and prays as follows:

1. Upon the request of Mr. Vázquez Arroyo, the Court extended the change of plea deadline until August 2, 2022. (*See* Docket Entry 2017)
2. The undersigned attempted to visit Mr. Vázquez Arroyo from July 25, 2022, until July 29, 2022, without success, prompting the undersigned to request additional time to file a change of plea motion. (*See* Docket Entry 2015)
3. On August 1, 2022, the undersigned was able to meet with Mr. Vázquez Arroyo. Unfortunately, the conversation was confrontational and unproductive, concluding after he informed that he wanted undersigned to be removed from his legal representation.
4. The undersigned again attempted to meet Mr. Vázquez Arroyo on August 2, 2022, but was informed by the guards that he had refused the legal visit.
5. The undersigned has attempted to secure a plea agreement with terms that would be acceptable to Mr. Vázquez Arroyo's wishes, but the lack of communication between Mr. Vazquez Arroyo and the undersigned at this critical juncture has hampered any meaningful advances in securing a plea agreement.

6. Although it is the undersigned's belief that Mr. Vázquez Arroyo wants to continue the plea negotiations with the Government, the most recent conversation with Mr. Vázquez Arroyo in which he made clear his desire to have someone else representing his interest complicates this.
7. Finally, the undersigned informs that due to other previously scheduled commitments, he will not be in the metropolitan area from August 5, 2022, in the afternoon until the morning hours of August 9, 2022.
8. If the Court wishes to inquire about the client's desire to have a different legal representative, the undersigned recommends that the Court schedules an in-person hearing at the earliest opportunity to discuss the matter with Mr. Vázquez Arroyo. The undersigned suggests the following dates for a hearing:
 - a. Tuesday, September 9, 2022, at 3:00 pm (or any time after 3:00 pm)
 - b. Wednesday, September 10, 2022, anytime between 10:00 am – 12:00 pm, or 2:00 – 4:30pm)
 - c. Thursday, September 11, 2022, anytime after 10:00 am.

WHEREFORE, Mr. Vázquez Arroyo respectfully requests that this Court grants the requested extension of time, and if necessary, sets an in-person hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of August 2022.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ Diego H. Alcalá Laboy
Diego H. Alcalá Laboy
PO Box 12247
Tel.: (787) 432-4910

USDC-PR No. 300504
dalcala@defensorialegal.com